



BRIEFING | Road Safety Priorities for the EU

Briefing to Members of the European Parliament
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Introduction

Progress towards the EU Road Safety Targets

22,660 people lost their lives on EU roads in 2019.¹ Since 2010, the EU27 achieved an overall reduction in road deaths of 24%, which equates to a 2.7% annual average reduction.² The EU target of halving road deaths by 2020 will not be reached.

In 2018, the European Commission (EC) adopted its EU Strategic Action Plan for Road Safety³ which included a new target to halve road deaths by 2030 compared to 2020 levels, as well as, for the first time, a target to halve the number of seriously injured over the same period. This was followed up in 2019 with the publication of the EU Road Safety Policy Framework 2021-2030 outlining the actions to be taken.⁴

Both deaths and serious injuries carry a huge cost to society. In monetary terms alone, the yearly cost of road crashes in the EU has been estimated in a new study to be around EUR 280 billion, equivalent to about 2% of GDP.⁵

In this briefing, ETSC outlines its recommendations to MEPs on what can be done to reach the new 2030 road safety targets as input to the European Parliament's Own Initiative Report on Road Safety.

The EU Road Safety Strategy 2021-2030

The EU Road Safety Framework (2019) set up a new governance framework and action within four themes including: infrastructure safety, vehicle safety, safe road use (including speed, alcohol and drugs, distraction and the use of protective equipment), emergency response as well as the two cross-cutting issues of enforcement and training.⁶

The Road Safety Framework proposes eight new Key Performance Indicators (KPIs) against which EU Member State performance will be analysed, as well as the intention, in a second

¹ ETSC (2020), Ranking EU Progress on Road Safety, 14th PIN Annual Report <https://bit.ly/3oCSyLq>

² *ibid*

³ EC (2018), EU Strategic Action Plan for Road Safety, <https://bit.ly/3bg8q2c>

⁴ EC (2019), EU Road Safety Policy Framework 2021-2030 - Next steps towards "Vision Zero", <https://bit.ly/3ebKnMY>

⁵ EC (2019), Handbook on the External Costs of Transport <https://bit.ly/3oISwSo>

⁶ EC (2020) Sustainable and Smart Mobility Strategy, <https://bit.ly/2XxH8MZ>

phase, to set outcome targets based on the indicators. EU Member States will meet for the first time at an “EU Results Conference” on 20 April 2021 to discuss the progress that has been tracked and measured by these new KPIs.

ETSC sees room for improvement and increased ambition, in particular, but not limited to, the following areas:

- Clearer priority measures for action are needed, as well as a detailed road map against which performance is measured and delivery made accountable to specific bodies;
- Prioritisation of measures to reduce serious injuries such as tackling speed especially in urban areas, in light of the new target;
- Policy measures, not just further research, on important areas such as distraction and drug driving enforcement;
- Legislation, where appropriate, instead of unenforceable voluntary commitments;
- Recognition of the need to revise legislation in the medium term (i.e. in 2025). For example, the General Safety Regulation for new vehicles will need to be updated to encompass new technology developments.

Under EU governance on road safety, ETSC would in particular also call for MEPs to support the creation of a new agency “to support safe, smart and sustainable transport operations.”⁷ The EC has committed to assessing the need for such an agency in its recent Sustainable and Smart Mobility Strategy. ETSC has been calling for such an agency for some time: this would increase the badly needed capacity on road safety management at EU level. Specifically, such an agency could also oversee the safe rollout of automated vehicles through market surveillance, real-world testing and in-depth crash investigation.⁸

In short, the Commission’s analysis of the current state of road safety in Europe is correct, but the planned policy approach will need renewed effort if it is to result in the needed rapid and far reaching improvement. The EP Own Initiative Report can provide impetus for improving the new EU road safety strategy.

⁷ EC (2020), Sustainable and Smart Mobility Strategy, Staff Working Document <https://bit.ly/3bxcpe>

⁸ ETSC (2019), Briefing: EU Strategic Action Plan on Road Safety, <https://bit.ly/2TQZEP4>

Key Priorities for the European Parliament Own Initiative Report on Road Safety

Improving Vulnerable Road User Safety; in Urban Areas and Beyond

Active travel is being encouraged for health, environmental, congestion and other reasons, moreover European cities and towns are responding to the new demand for safe cycling and walking in the wake of the Covid-19 pandemic.

In 2018, pedestrians killed represented 21% and cyclists 8% of all road deaths.⁹ Motorcyclists accounted for 15% and moped riders 2.6% of all road deaths in the EU.¹⁰

The share of deaths of unprotected road users is increasing as car occupants have been the main beneficiaries of improved vehicle safety and other road safety measures. However, there are few actions in the new EU Road Safety Strategy targeting pedestrians and cyclists specifically.

One priority area of high relevance for Vulnerable Road Users (VRUs) in the near future is urban mobility, as the EC will be adopting a new Urban Mobility package including actions on road safety already identified in the EU Road Safety Strategy. This will be important to help improve the priority group of vulnerable road users as well as reduce serious injuries amongst them.

ETSC has been making the case for many years that cities need to be redesigned to promote the safest and most sustainable forms of transport – keeping pedestrians and cyclists separate from cars, vans and lorries. ETSC supports this reprioritisation of transport infrastructure in dense, urban areas away from individual motorised transport towards public transport and sustainable, safer and healthier modes such as walking and cycling.¹¹ The EU Road Safety

⁹ ETSC (2020), PIN Flash 38, How Safe is Walking and Cycling in Europe <https://bit.ly/2LJDpJu>

¹⁰ ETSC (2020), Position Paper on Vehicle Roadworthiness Package <https://bit.ly/3kfZdl>

¹¹ ETSC (2020), PIN Flash 38, How Safe is Walking and Cycling in Europe, <https://bit.ly/2LJDpJu>
ETSC PIN Flash 37, Safer Roads, Safer Cities: How to Improve Urban Road Safety in the EU, <https://bit.ly/3q6oXu2>

Strategy and EC Smart and Sustainable Mobility Strategy both rightly identify the synergies between safety and sustainability measures in urban areas: for example, less car use in cities combined with safer environments for pedestrians and cyclists will reduce CO₂ emissions, improve air quality, reduce congestion – and help develop a more active and healthy population.

One area of action in urban mobility policy was the launch of the Safe City Award in 2020.¹² ETSC calls for another step: a new Safe City Label which could be linked to developments in urban mobility and infrastructure measures and protection of VRUs and involve adequate funding and monitoring.¹³

Funding in this area is also crucial. A recent report of the European Court of Auditors, which evaluated the use of EU funds in the area of urban mobility, found that, to date, the hope for ‘step change’ to improve sustainable urban mobility has not taken place.¹⁴ The report calls on the EC to publish better data on urban mobility, encourage more uptake of Sustainable Urban Mobility Plans (SUMP) and link access of funds to SUMP. These recommendations echo ETSC’s recommendations from its recently published PIN Reports on Urban Mobility (2019) and Pedestrian and Cyclist safety (2020).¹⁵

Pedestrian, Cyclist and PTW Safety

ETSC calls on MEPs to support:

- Adoption of specific targets to reduce deaths and serious injuries of vulnerable road users.¹⁶
- Encouragement of EU Member States to adopt maximum 30km/h in residential areas and areas where there are high levels of cyclists and pedestrians, or where there could be potential to increase cycling and walking by investing in infrastructure.
- In a future revision of the Infrastructure Safety Directive, common EU curricula for auditors and inspectors, including specific training on the needs of VRUs: pedestrians, cyclists, PTWs, the elderly and road users with reduced mobility.
- Intensified co-ordination on enforcement, especially of speeding, in urban areas where there are high numbers of pedestrians and cyclists.

¹² EC (2019), EU Road Safety Policy Framework 2021-2030 Next Steps Towards Vision Zero, <https://bit.ly/2XXX8Xh>

¹³ EC (2018), EU Strategic Action Plan on Road Safety, <https://bit.ly/2xHGu5w>

¹⁴ European Court of Auditors (2020), Special Report Sustainable Urban Mobility in the EU: No substantial improvement is possible without Member States’ commitment, <https://bit.ly/3oEtrHV>

¹⁵ <https://etsc.eu/projects/pin/>

¹⁶ ETSC (2018), Briefing: 5th EU Road Safety Action Programme 2020-2030, <https://bit.ly/2LuTDBW>

- Dedicated funds for cycling, walking and PTW infrastructure under the Connecting Europe Facility (CEF) to support increasing the safety of VRUs.
- Inclusion of the EuroVelo cycle network as part of the TEN-T and earmarking CEF funds for its continued realisation.

Safe Urban Mobility

ETSC calls on MEPs to support:

- Integrating EU road safety targets and actions, as well as monitoring and promoting best practice on taking up the Guidelines of Sustainable Urban Mobility Plans.¹⁷
- Funding, launching and monitoring a Safer City Label.
- Drafting speed limit guidelines based on the Safe System approach and promote and best practice in traffic calming measures in particular when 30km/h zones are introduced.¹⁸
- Support the use of EU funds for cities to introduce priority measures such as 30 km/h zones and speed enforcement.
- In the context of the implementation of the GSR, support cities in setting up speed limit databases to support the deployment of Intelligent Speed Assistance. Applying minimum safety criteria for supporting VRU infrastructure in an urban context within, for example, EU projects to support SUMP at city level.
- Creating an indicator for the reporting of use of EU funds on improving urban road safety.

Micromobility

The EC will develop Guidance on Safe Use of Micromobility Devices. As noted by the EC, ‘these new personal mobility devices, in particular shared e-scooters, which were deployed in large numbers in cities all over Europe, also raise a number of safety concerns –some related to the safety of the devices themselves’.¹⁹ The Guidance could cover where they can be used, at what speed, after which training, as of what age and in compliance with which safety rules.²⁰ ETSC would furthermore call for minimum vehicle safety requirements for micromobility devices similar to those of pedal cycles.

¹⁷ Ibid

¹⁸ Ibid

¹⁹ European Commission Sustainable and Smart Mobility Strategy, Staff Working Document <https://bit.ly/38z87xY>

²⁰ ibid

ETSC calls on MEPs to support:

- Guidance on managing safety aspects of micromobility devices.
- Development of minimum vehicle safety requirements for micromobility devices similar to those of pedal cycles.
- Updating the CARE database requirements to be able to identify the collisions involving an e-scooter or electrically-assisted cycles.

Tackling Speed

Speed plays a key role in causing road crashes and increasing their severity. Member States and the EU institutions should prioritise a range of integrated measures that together bring road users to safe speeds. These measures include safe and credible speed limits supported by self-explaining and self-enforcing roads, vehicles that help drivers to comply with speed limits, stricter laws, effective traffic law enforcement activities and road user education.²¹

ETSC fully endorses the conclusions of the European Commission's Executive Seminar on speed and speed management which elaborate further on possible measures.²²

ETSC calls on MEPs to support:

- The adoption of a European Commission Recommendation on speed covering infrastructure, vehicle and enforcement safety areas.
- Encouraging Member States, through a European Commission Recommendation, to apply safe speed limits in line with the Safe System approach for the different road types such as 30 km/h on urban roads in residential areas and areas where there are high levels of cyclists and pedestrian, 70 km/h on undivided rural roads and a top speed of 120km/h or less on motorways.²³
- Encourage Member States to provide clear speed limit signs to inform drivers about applicable limits and support the deployment of ISA.

²¹ ETSC PIN Flash (2019) Reducing Speeding in Europe <https://bit.ly/38ueB1q>

²² EC (2020), Conclusions of Executive Seminar on speed and speed management <https://bit.ly/3tfuTtI>

²³ ETSC (2019), PIN Flash 36, Reducing Speeding in Europe <https://bit.ly/38ueB1q>

Enforcement

Increased and well-publicised enforcement targeting the main risks of speeding, drink and drug driving, distraction and non-use of seat belts on the road forms a fundamental part of achieving the new EU 2030 targets.

The Cross-Border Enforcement Directive 2015/413 is up for revision.²⁴ ETSC has identified a number of barriers which need to be addressed in the upcoming revision. These include the need to update camera specifications and overcoming the lack of human resources and political support for manual follow-up.²⁵

The revision should also prioritise action to improve and align the enforcement of the main offences at a national level. This includes for example guidance on optimal use of safety cameras to reduce speeds and increase compliance.²⁶

ETSC calls on MEPs to support:

- Revising Directive 2015/413 to strengthen the enforcement chain and adapting existing EU mutual assistance procedures to deal with cross border road traffic offences.²⁷
- Inclusion in the revision of the mutual recognition of non-financial penalties such as driving disqualifications and demerit point systems.
- Action to improve and align the enforcement of the main offences at a national level.

Education and Training: Revision of the European Driving License Directive

The European Driving Licence Directive 2006/126 is due for revision in the near future. MEPs should call for a further improvement of the current quality of the licensing and training systems, with a focus on young novice drivers and riders. Specific recommendations for the priority areas on the revision of the Driving Licence have been developed by ETSC.²⁸

ETSC calls on MEPs to support:

- A graduated licensing system that encourages young people to gain more experience

²⁴ EU Directive 413/2015 facilitating cross-border exchange of information on road-safety-related traffic offences, <https://goo.gl/WnFrtQ>

²⁵ ETSC (2016), PIN Flash 31, How Traffic Law Enforcement Can Contribute to Safer Roads, page 42, <https://goo.gl/GVwmf5>

²⁶ ETSC (2019), PIN Flash 36, Reducing Speeding in Europe, <https://bit.ly/38ueB1q>

²⁷ Grimaldi (2016) Evaluation Study of the CBE Directive 2011/82, <https://goo.gl/2xSXH2>

²⁸ See ETSC's recommendations for the priority areas on the revision of the Driving Licence in ETSC (2019), Response to the EU Strategic Action Plan, <https://bit.ly/2lpQNkj>

- while limiting certain high-risk activities such as driving at night and with passengers.
- Introducing hazard perception training, expanding formal training to cover driving and riding style as well as skills and encouraging more accompanied driving to help gain experience.
 - Developing minimum standards for driver training and traffic safety education with gradual alignment in the form, content and outcomes of driving courses across the EU.
 - Making theoretical and practical training as well as a practical test mandatory for obtaining a driving licence for moped (AM).
 - Updating the Directive to ensure all new drivers are trained in using the new technologies as well as semi automated driving.
 - Extending the provisions set out for Group 2 drivers to apply also to drivers of Category B vehicles using their driving licence for professional purposes: taxis, drivers of vans (N1 vehicles). In a second step, extending the current legislative framework for professional driver training to van drivers.
 - Not allowing the lowering of the minimum age for any road users.

Vehicle safety

The EU has the exclusive competence to set minimum safety standards for all new vehicles sold on the EU market. These standards were updated in 2019.²⁹

Success, in terms of lives saved, will depend on the detailed technical standards for the newly mandated vehicle requirements, which are currently being worked out. ETSC is particularly concerned about the requirements for Intelligent Speed Assistance (ISA) technology^{30, 31}, and “direct vision” standards (to improve visibility around the vehicle for drivers) for new Heavy Goods Vehicles.³²

Motorists also need to keep their vehicles in a roadworthy condition. Roadworthiness testing exists so that a vehicle’s original design and manufacture are retained in service. EU

²⁹Regulation (EU) 2019/2144 on type-approval requirements for motor vehicles and their trailers, and systems, components and separate technical units intended for such vehicles, as regards their general safety and the protection of vehicle occupants and vulnerable road users <https://eur-lex.europa.eu/eli/reg/2019/2144/oj>

³⁰ EC Proposed Text for the ISA Delegated Act: <https://bit.ly/3uzsCDF> and ETSC Position on the ISA Delegated Act: <https://bit.ly/3peG2Cx>

³¹ ETSC (2021) letter to IMCO, <http://bit.ly/2O4G4io>

³² ETSC (2020), How to improve the safety of goods vehicles in the EU? (PIN Flash 39), <https://etsc.eu/projects/pin/>

roadworthiness legislation was last revised in 2014. ETSC has prepared an updated position paper to feed into the current review of the implementation by the EC and the EP. The position includes priorities not taken on board last time such as extending periodic technical inspections to all PTW types and new developments such as eCall and vehicle automation.³³

Following the adoption of the new minimum safety standards for new vehicles, ETSC recommends:

- To deliver on the estimated number of deaths and serious injuries prevented by adopting strong and timely secondary regulation implementing the General Safety Regulation.
- To require a high level of performance of ISAsystems to be fitted in all new vehicles.
- To consider the practical application of mandating the fitment of overrideable ISA systems³⁴ on motorcycles and the feasibility and acceptability of non-overrideable ISA for cars, vans, trucks and buses.
- To mandate top speed limiters on vans, such as for trucks and buses.
- To consider the feasibility of limiting the maximum top speed of all new vehicles as an effective way of reducing road casualties, but also air pollution and carbon dioxide emissions.
- To develop crash test dummies representative of more aspects of variability such as age, gender, size and stature for users inside and outside of the vehicle.
- To consider the compatibility issue within future vehicle design to improve further the safety of pedestrians, cyclists and vehicle occupants as well as powered two wheelers.
- To encourage Member States to provide tax incentives for the purchase and use of safe cars (for example five-star Euro NCAP).
- To revise legislation on car CO₂ labelling and marketing to require inclusion of Euro NCAP test results when available.
- To promote technologies or applications that remind the driver on exiting the vehicle that the child seat is occupied.

Automated Driving

ETSC welcomes the EC's work on automated and connected mobility, as there is an urgent need for a comprehensive regulatory framework for vehicles with automated driving systems

³³ ETSC (2020), Position Paper on Vehicle Roadworthiness Package, <https://bit.ly/3aXNqgF>

³⁴ibid

on-board.

Although the EC indicates that the new GSR provides a “clear legal framework” for the (type) approval of automated vehicles, detailed and robust technical standards are not yet adopted. The framework will only apply as of 2022, and until then guidelines on the use of the type-approval exemption procedure will be used instead. ETSC already expressed its safety concerns regarding the lack of transparency of the exemption procedure³⁵, and furthermore considers the new guidelines insufficient to guarantee safety and transparency.

ETSC calls on MEPs to ask the EU to:

- Develop a coherent and comprehensive EU regulatory framework for the safe deployment of vehicles with automated driving systems on board as well as for autonomous vehicles.
- Complement the EU type approval regime to ensure that automated vehicles are safe and comply with all specific obligations and safety considerations of the traffic law in all EU Member States.
 - This includes setting out detailed type approval standards to cover all the new safety functions of automated vehicles, to the extent that an automated vehicle will pass a comprehensive test equivalent to a ‘driving test’.
- Request the EC to place the role of the driver, as well as interaction between the driver and the automated driving systems, central when preparing technical requirements.
- Request the EC to ensure via technical requirements that the drivers can easily identify whether their vehicle system or driver is responsible for the driving task and prohibit any system that blurs the boundaries between the two types, as driver confusion has already resulted in crashes with road deaths.
- Review technical requirements for currently available assisted driving systems aiming to improve primarily the comfort of the driver based on the latest data from crashes and research, in order to address these systems’ risks to road safety, such as driver overreliance, distraction and mode confusion.
- Mandate independent investigation of crashes involving vehicles equipped with assisted and automated driving systems, ideally coordinated by an EU agency, before more advanced systems are put on the market.
- Revise the EU Directive 2006/126 on driving licences to make sure all new drivers are

³⁵ ETSC (2018) Letter: Improving the Transparency of the Exemption Procedure for the Type Approval of New Vehicle Technologies <http://bit.ly/2HzUEly>

trained in using the new technologies as well as semi and fully automated driving.³⁶

Fitness to Drive: Tackling Alcohol and Drugs

It is estimated that up to 2% of kilometers travelled in the EU are driven with an illegal Blood Alcohol Concentration (BAC), but around 25% of all road deaths in the EU are alcohol related.³⁷ Efforts to tackle drink driving are paying off, through reducing the legally permitted blood alcohol concentration, enforcement efforts combined with awareness campaigns and the use of alcohol interlock devices. Recorded road deaths attributed to alcohol were cut by 25% between 2010 and 2018 in the EU23, while other road deaths went down by 20% over the same period.³⁸

However, the range of psychoactive substances available for illicit use is widening in the EU and this is further proven by the increased prevalence of illicit drugs in drivers killed in traffic collisions. The DRUID study estimated that illicit and medicinal psychoactive drugs were found in 15.2% and 15.6% respectively of road deaths.³⁹

ETSC calls on MEPs to support:

- Proposing a directive on Drink driving, setting a zero-tolerance level for all drivers.
- Mandating alcohol interlocks for repeat offenders, high level first time offenders and all professional drivers.
- Recommending that Member States make wider use of conditional licences (Codes 61 to 69 of Directive 2006/126/EC) where possible.
- Introducing an EU zero tolerance system for illicit psychoactive drugs using the lowest limit of quantification that takes account of passive or accidental exposure.
- Adopting common standards for roadside drug driving enforcement and ensuring that police forces are properly trained in when and how to perform drug screening, field impairment tests and use of roadside screening devices.

³⁶ ETSC (2016), Maximising the Potential of Automated Driving in Europe, <https://bit.ly/2scnxBN>

³⁷ ETSC (2014), PIN Flash Report 27, Ranking EU Progress on Car Occupant Safety, <https://goo.gl/wiksTC>

³⁸ ETSC (2019), Progress in Reducing Drink-Driving and other Alcohol-Related Road Deaths in Europe, <https://bit.ly/3kpg5xS>

³⁹ European Commission (2011), DRUID Deliverable 2.2.5, Prevalence of alcohol and other psychoactive substances in injured and killed drivers, pp. 164-166, <https://goo.gl/j52ryq>
Cited in ETSC (2017), Preventing Drug Driving in Europe, <https://bit.ly/3bCsFWJ>

- Applying the use of the classification and labelling of medicines that affect driving ability⁴⁰ and supporting awareness information campaigns of medical professionals.
- As part of the revision of the Driving Licence Directive, develop and promote evidence-based guidelines for family doctors and other medical professionals involved in assessing the functional capabilities of someone suspected of being an unfit driver.⁴¹

Professional Transport

Up to 40% of all road deaths in the EU are work-related, even though the exact number is unknown.⁴² The main causes of road traffic collisions are risks that typically need to be managed in the Work-Related Road Safety (WRRS) context and include speed, drink and drug driving and, especially whilst driving for work, higher levels of fatigue and distraction. EU measures to tackle these risks have partly already been covered in other sections of this position paper. The most important piece of EU legislation addressing Occupational Safety and Health (OSH) is Directive 89/391. The Directive lays down general principles concerning prevention, assessment and elimination of risks.

As regards Regulation (EU) 2020/1054 amending Regulation (EC) 561/2006 on minimum requirements on maximum daily and weekly driving times, ETSC recommends to:

- Work towards consistent levels of enforcement of working time across the EU.
- Support efforts to tackle fraudulent use of tachographs including equipping enforcement officers with knowledge and equipment and improving use of data sharing arrangements between agencies within Member States.

Vans

A total of 2630 people were killed in collisions involving Light Goods Vehicles (LGVs) in the EU in 2018 alone, representing 11% of all road deaths.⁴³ This group deserves a special focus in the next decade. Van use in Europe has continued to rise due to, for instance, the increased demand for home deliveries.⁴⁴

⁴⁰ EMCDDA 2012, Driving Under the Influence of Drugs, Alcohol and Medicines in Europe: Findings from the DRUID Project, p31, <https://goo.gl/6nbXQN>

⁴¹ ETSC (to be published in March 2021), PIN Flash 40, Are medical fitness to drive procedures fit for purpose?, <https://etsc.eu/projects/pin/>

⁴² If commuting and third party deaths are included. ETSC (2017), PIN Flash 33, Tapping the Potential for reducing work-related road deaths and serious injuries, <https://goo.gl/A2KMQ7>

⁴³ ETSC (2020) How to improve the safety of goods vehicles in the EU? PIN Flash Report 39 <https://bit.ly/3pFCEj6>

⁴⁴ For example, LGV traffic in the UK has increased by approximately 40% during the 2001-2010 period. In: DfT, THINK!

Van drivers travelling for work are often under pressure to meet tight deadlines and this means that they are a group that are often likely to speed.⁴⁵ International transport operators using LGVs of over 2.5t will now be subject to EU rules for driving and resting times, and their vehicles will need to be fitted with tachographs, according to updated transport regulations.⁴⁶

During the revision of the Driving Licence Directive 2006/126, the current requirements for larger professional vehicle classes, including the need for professional driver training, should also be extended to vans, as should roadworthiness checks.^{47 48}

ETSC recommendations

- Revise the Driving Licence Directive 2006/126 to mandate provisions set out for Group 2 drivers to apply to drivers of Category B vehicles using their driving licence for professional purposes: taxis, drivers of vans (N1 vehicles).
- Extend the current legislative framework for professional driver training to van drivers.
- Include vans in annual periodic technical inspections and roadside inspections under the roadworthiness package revision.
- Fit all new light goods vehicles (N1) with top speed limiters set at 130km/h.

⁴⁵ ETSC (2014), PRAISE Report Managing the Road Risk of Van Fleets, page 33, <https://goo.gl/bGdAXd>

⁴⁶ Regulation (EU) 2020/1054 as regards minimum requirements on maximum daily and weekly driving times, minimum breaks and daily and weekly rest periods and Regulation (EU) 165/2014 as regards positioning by means of tachographs, <https://eur-lex.europa.eu/eli/reg/2020/1054/oj>

⁴⁷ ETSC (2014), PRAISE Report, Managing the Road Risk of Van Fleets, <https://goo.gl/bGdAXd>

⁴⁸ ETSC (2020), Position Paper on Vehicle Roadworthiness Package, <https://bit.ly/3kfZdl>

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The European Transport Safety Council (ETSC) is a Brussels-based, independent non-profit making organisation dedicated to reducing the numbers of deaths and injuries in transport in Europe.